

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO. 1:18-CR-708
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
v.)	
)	
KENNETH TYSON,)	<u>DEFENDANT’S UNOPPOSED MOTION</u>
)	<u>TO MODIFY BOND CONDITIONS</u>
Defendant.)	

Defendant Kenneth Tyson, through his undersigned counsel, respectfully moves for a modification of his bond conditions to permit him to travel out of the Northern District of Ohio between February 4, 2019, and February 6, 2019, to assist his partner as she undergoes a medical procedure in the Southern District of New York. A memorandum in support of this Motion is attached. The Government does not oppose this Motion.

Respectfully submitted,

/s/ Chris N. Georgalis
Christos N. Georgalis (OH: 0079433)

Flannery | Georgalis, LLC
1375 E. 9th St., 30th Floor
Cleveland, OH 44114
Telephone: (216) 367-2095
Facsimile: (216) 367-2095
Email: chris@flannerygeorgalis.com

Attorney for Defendant Kenneth Tyson

MEMORANDUM IN SUPPORT

On December 7, 2018, this Honorable Court set an unsecured appearance bond limiting Mr. Tyson's travel to the Northern District of Ohio. (Order Setting Conditions of Release, Doc. 5, PageID# 21.)

Mr. Tyson's significant other is scheduled to undergo a medical procedure in the Southern District of New York between February 4, 2019, and February 6, 2019. She was originally scheduled for the procedure later in February, but she was very recently notified that the procedure was moved up to next week. Mr. Tyson seeks permission from this Court to travel with his significant other for the purpose of assisting her with her needs as she travels to the medical facility, undergoes these procedures, and travels back to Ohio.

AUSA Carmen Henderson has been notified of this request, and she was provided details about the nature of the medical procedures. The Government has no objection to the granting of this request.

WHEREFORE, Defendant Kenneth Tyson respectfully requests than an Order issue to permit Defendant to travel out of the Northern District of Ohio between February 4, 2019, and February 6, 2019, for the purpose of assisting his significant other as she undergoes medical procedures in the Southern District of New York.

Respectfully submitted,

/s/ Chris N. Georgalis

Christos N. Georgalis (OH: 0079433)

Flannery | Georgalis, LLC

1375 E. 9th St., 30th Floor

Cleveland, OH 44114

Telephone: (216) 367-2095

Facsimile: (216) 367-2095

Email: chris@flannerygeorgalis.com

Attorney for Defendant Kenneth Tyson

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Chris N. Georgalis
Christos N. Georgalis

Attorney for Defendant Kenneth Tyson